Republic of the Philippines
DEPARTMENT OF AGRICULTURE
Office of the Secretary
Bureau of Agriculture and Fisheries Product Standards
Elliptical Road, Diliman, Quezon City

09 June 2000

Dockets Management Branch
HFA-305
Food and Drug Administration
Room 1061
5630 Fishers Lane
Rockville, MD 20852

Re: Philippine Department of Agriculture's Support of the Position of the United Coconut Associations of the Philippines (UCAP) and the Philippine Coconut Research and Development Foundation (PCRDF) on Food Labeling Rules to Include the amounts of Trans Fatty Acids in Food Labels and Related Health Claims

STATEMENT

The Philippine Department of Agriculture strongly supports the position submitted by the United Coconut Associations of the Philippines (UCAP) and the Philippine Coconut Research and Development Foundation (PCRDF) on the proposed food labeling rules to include the amounts of trans fatty acids (TFAs) in food labels.

We welcome the provision of information of the levels of TFAs in food and dairy products. However, the presentation of information on TFAs should be separate and distinct from saturated fats. While TFAs result from the partial hydrogenation of unsaturated fatty acids, TFAs are unsaturated. It is technically inaccurate to lump TFAs with saturated fats. Furthermore, saturated fat claims should not be the heading for claims related to TFAs.

Very truly yours,

EDGARDO J. ANGARA
Secretary

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April 15, 2000

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Dockets Management Branch
HFA - 305
Food and Drug Administration
Room 1061
5630 Fishers Lane
Rockville, MD 20852

Re: Request For Comment, Food Labeling; Trans Fatty Acids in Nutrition Labeling, Nutrient Content Claims, and Health Claims.
Docket No. 94P-0036

Introduction

These comments are submitted on behalf of the United Coconut Associations of the Philippines (UCAP) and the Philippine Coconut Research and Development Foundation (PCRDF) in response to the proposed amendment to the food labeling rules to include the amount of trans fatty acids in food labels and dietary products published at 64 Fed. Reg. 62745 et seq. (November 17, 1999).

UCAP is a confederation of associations and organizations representing all sectors in the Philippine coconut industry. It was incorporated in 1964 as a non-profit organization. The PCRDF is a non-profit science and research institution established in 1975 to promote the growth

and development of the coconut industry through research and development, technology transfer and manpower training.

The Philippine coconut industry has actively participated in the legislative process leading to the enactment of the Nutrition Labeling and Education Act of 1990 and submitted extensive comments to the FDA during the rule-making process to implement said legislation. UCAP and the PCRDF are pleased to have this opportunity to present their views on some of the issues raised by the FDA's request for comment that impact on food labeling regulations.

UCAP and PCRDF fully support the FDA's efforts to include the amount of trans fatty acids in nutrition labeling in foods and dietary products. However, UCAP and PCRDF believe that the manner currently proposed by the FDA to accomplish this is confusing and misleading to the consumer in terms of the health effects of trans fatty acids in the diet.

UCAP and PCRDF have always advocated for clear nutrition labeling rules that provide accurate nutrition information to the consumer. Labels that limit identification to certain nutritional content often mislead consumers into buying a food product thinking that it is more healthy when in fact it may not be. As early as 1988 and 1989, when the focus of attention in food labeling then was saturated fats, specifically the so called "tropical oils," UCAP warned that singular attention to "tropical oils" would in fact mislead consumers into thinking that foods without saturated fats would be healthier when that often is not the case. The FDA itself recognized such to be a problem when it noted that "some hydrogenated vegetable oils that are used in processed foods as alternatives to animal fat or coconut oil or palm kernel oil may contain high levels of saturated fatty acids." 56 Fed. Reg. 60482 (Docket No. 84N-0153). Indeed, some of the partially hydrogenated fats in the United States have fifty (50) percent or

more of their fatty acids as trans fatty acids and that the effects of trans fatty acids on the serum lipoprotein are bad because they raise the bad cholesterol (LDL) and lower the good cholesterol (HDL) levels.[1] In fact, these studies are the foundation for the CSPI petition that eventually led to the current FDA rule-making process on trans fats.

Labeling

1. Saturated Fat and Trans Fats

UCAP and PCRDF support the FDA's proposed amendment to include the amount of trans fatty acids in food labels. However, UCAP and PCRDF are concerned that the FDA's proposed manner in requiring the amount of trans fats in food and dietary products is confusing and misleading to the ordinary consumer.[2]

UCAP and PCRDF respectfully submit that the trans fatty acid nutritional information should be separated from the saturated fats information and that the information on the saturated fat and the trans fatty acid contents be indicated in separate lines.

Trans fatty acids are not saturated fats. Trans fatty acids are unsaturated fatty acids with trans configuration. They are chemically different and have different metabolic effects on the body. To simply categorize trans fats with saturated fats would be confusing and misleading to the consumer. UCAP and PCRDF recognize the FDA's desire of providing simple nutritional information to the public. However, over simplified information can sometimes become misinformation. Newer scientific and medical data on blood lipids focus more on LDL (bad

[1] Mensink and Katan, New England Journal of Medicine, Vol. 323 No. 7 at 439-445 (Aug. 16, 1990). See also, Enig et. al., Journal of the American College of Nutrition, Vol. 9, No. 5 at 471-486 (1990).

[2] Include the amount of trans fats with saturated fat, and call the total value "saturated fat" with a footnote referring to "Contains ___g trans fat".

cholesterol) and HDL (good cholesterol) rather than just cholesterol. It is the LDL that becomes toxic when its lipid coat is peroxidized. The HDL on the other hand exerts protective effects on the LDL. Therefore, the more important factor to consider is not just the total elevation of the cholesterol levels, but the ratio between LDL and HDL.[3]

As noted by the FDA, additional scientific and medical studies consistently showed that trans fatty acids raise serum LDL-C levels -- the major dietary risk factor for coronary heart disease (CHD) -- in some instances, almost double that of some saturated fats. Furthermore, trans fats not only raise the "bad cholesterol" LDL-C, but it also lowers the "good cholesterol" HDL, resulting in undesirable ratios of LDL:HDL.

On the other hand, some saturated fats of the medium chain configuration like coconut oil, while neutral in its effects vis-a-vis the LDL, in fact raises HDL, the good cholesterol. It has been established that trans fats and saturated fats are absorbed and metabolized by the body in different ways. To simply categorize trans fats with saturated fats would therefore mislead the consumer into thinking that all saturated fats and trans fats have the same effects on blood lipids, and ultimately on healthy diets.

2. **Long Chain and Medium Chain Saturated Fats**

Lumping trans fats with saturated fats would further confuse the consumer because not all saturated fats have the same physiological characteristics in our diets. While UCAP and PCRDF recognize that the FDA is not prepared to address the differentiation of the various saturated fats, medical and scientific research have established the different effects that the long chain saturated fats and the medium chain saturated fats have in humans. The history of this trans fatty acid

[3] For example, it is recommended that total LDL:HDL ratio must be at least 3:1 or lower.

debate has shown the dangers of simply categorizing some fats as "good fats" and others as "bad fats."

At the height of the so-called tropical oils debate in the late 1980s and early 1990s, the conventional wisdom then was simply to target certain fats, i.e., the "tropical oils" (because they were saturated fats) and eliminate them from the consumer's diet, as if this would automatically lead to healthier lifestyles and diet. As we have now seen, eliminating saturated fats and then substituting them with hydrogenated polyunsaturated oils does not necessarily mean a healthy diet because hydrogenation creates trans fats which adversely affects blood serum.

Most vegetable oils cannot be used extensively for food processes unless they are changed from their liquid form to a more solid form. Therefore, food manufacturers convert the liquid oils, i.e., soybean, corn, canola, cottonseed and sometimes peanut oil, into a more solid form by hydrogenation with the resultant trans fatty acids.

UCAP and PCRDF strongly urge the FDA to recognize that in order to fully educate the American consumer about the proper balance of fats in one's diet, it is important to distinguish long chain saturated fatty acids (LC-14 carbons and longer) and medium chain saturated fatty acids (MC-6 to 12 carbons long). There is ample medical and scientific evidence that medium chain fatty acids (C8, C10, and C12) do not act like the long chain fatty acids (C14, C16, and C18). It is only the long chain fatty acids that raise blood lipids. Studies have shown that medium chain triglycerides are not significantly associated with coronary heart disease (CHD). Medium chain triglycerides are easily digested, absorbed and rapidly burned into energy by the liver and metabolized more like carbohydrates rather than fat. See, e.g., "A Reevaluation of Coconut Oil's Effect on Serum Cholesterol and Atherogenesis," by Drs. George L. Blackburn and Vigen K. Babayan of the Harvard Medical School and New England Deaconess Hospital

(and authorities cited therein): Mascioli, E.A. et al. Serum Fatty Acids After Intravenous Administration. Lipids, XXIV, No. 9 (1989).

Because of these characteristics, MCTs like coconut oil, are often used in special food preparations for those who suffer digestive disorders and have trouble digesting fats. Similarly, it is used in infant formula, for the treatment of malnutrition, since it is readily absorbed and easily converted into energy without putting excessive strain in the digestive system. Blackburn and Babayan, "A Reevaluation of Coconut Oil's Effect on Serum Cholesterol and Atherogenesis," supra; Fife, B. Saturated Fat May Save Your Life, at 108 (1999).

Likewise, numerous studies have demonstrated that MCTs, like coconut oil, have a neutral effect on cholesterol levels, and may not be as hypercholesterolemic as other fats.[4] See also, Grundy, American Journal of Clinical Nutrition, Vol. 49 at 393-4 (1989); Hayes, 6th Asian Congress of Nutrition Symposium (1991). UCAP and the PCRDF believe that now is an opportune time for the FDA to revisit the issue of clarifying the distinct differences between the long chain saturated fatty acids and the medium chain saturated fatty acids.

Conclusion

UCAP and PCRDF once again commend the FDA for this initiative with the intent of fully educating the public about nutritional information. UCAP and PCRDF appreciate this

[4] See, Fife, B. Saturated Fat May Save Your Life, at 111 (1999); citing Hegsted, D.M., et. al. 1965. Qualitative Effects of Dietary Fat on Serum Cholesterol in Man. Am. J. of Clin.Nutr., 17:281; Hashim, S.A., et al. 1959 Effect of Mixed Fat Formula Feeding on Serum Cholesterol Level in Man. Am. J. of Clin. Nutr., 1:30; Bray, G.A., et al. 1980. Weight Gain of Rats Fed Medium Chain Triglycerides Is Less Than Rats Fed Long Chain Triglycerides. Int. J. Obes., 4:27-32; Geliebter, A. 1983. Overfeeding With Medium Chain Triglycerides Diet Results in Diminished deposition of Fat. Am. J. of Clin. Nutr., 37:104; Baba, N. 1982. Enhanced Thermogenesis and Diminished Deposition of Fat in Response to Overfeeding With Diet Containing Medium Chain Triglycerides. Am. J. of Clin. Nutr., 35:678; Greenberger, N.J. and Skillman, T.G. 1969. Medium Chain Triglycerides: Physiologic Considerations and Clinical Implications. New Engl. J. Med., 280:1045-58; Fino, J.H. 1973. Effect of Dietary Triglyceride Chain Length on Energy Utilized and Obesity in Rats Fed High Fat Diets. Fed. Proc., 32:993.

opportunity to present their views and urge the FDA to take them fully into account in formulating its final rules on including trans fats in nutrition labels.

Respectfully submitted,

Arthur V. Medel
Counsel, United Coconut Associations of the Philippines and Philippine Coconut Research and Development Foundation

☐ We agree to the establishment of ISO/TC 34 Working Group.

☑ We do not agree to the establishment of ISO/TC 34 Working Group. The reasons for our disagreement are the following:

If a new working group is established,

☑ We wish to actively participate in the work through correspondence or attendance to ISO meetings.(If yes, please give the name(s) and address(es) of nominated expert(s), as an annex).

☐ We do not wish to participate in the work of the WG.

Date: 02 June 2010 Signature:

MA. CONCEPCION D. LIZADA
Director, BAFPS

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